

CAUSE NO. C-1-PB-17-_____

ESTATE OF	§	IN PROBATE COURT NO. 1
JUAN ANGEL FLORES,	§	
	§	OF
	§	
DECEASED	§	TRAVIS COUNTY, TEXAS

**APPLICATION (1) TO DETERMINE HEIRSHIP AND
 (2) FOR APPOINTMENT OF INDEPENDENT CO-ADMINISTRATORS
 AND ISSUANCE OF LETTERS OF INDEPENDENT ADMINISTRATION**

TO THE HONORABLE JUDGE OF THIS COURT:

COMES NOW Joanne F. Kuehne and Patricia R. Carvalho (collectively, "Applicants") who would respectfully show the Court as follows:

1. Applicant Joanne F. Kuehne is an individual interested in this estate, domiciled in and residing at 5601 Bryon, El Paso, Texas 79904.
2. Applicant Patricia R. Carvalho is an individual interested in this estate, domiciled in and residing at 4301 Thomason Avenue, El Paso, Texas 79904.
3. Juan Angel Flores ("Decedent") died on December 18, 2016, in Austin, Travis County, Texas, at the age of seventy-one (71) years.
4. The Court has jurisdiction and venue over this matter because Decedent was domiciled in and a resident of Austin, Travis County, Texas on his date of death.
5. Decedent owned real and personal property, generally described as a residence, financial accounts, furniture, vehicles, and personal effects, and having a total probable value in excess of \$100,000.00.
6. Decedent was never married.
7. No children were born to or adopted by Decedent.
8. To the best of Applicant's knowledge, Decedent died intestate.

9. Applicants are interested in the estate of Decedent as partial owners of Decedent's intestate estate.

10. The names, ages, marital statuses, and residences of all of Decedent's heirs, the relationship of each heir to Decedent, and the true interest of each of such heirs in the estate of Decedent are as follows:

<u>Name & Residence</u>	<u>Age, Marital Status, Relationship to Decedent</u>	<u>Share of Community Property</u>
Joanne F. Kuehne 5601 Bryon El Paso, TX 79904	Age 73, Married, Sister	1/6
Patricia R. Carvalho 4301 Thomason Ave. El Paso, TX 79904	Age 65, Single, Sister	1/6
Michael G. Flores 4946 S. Manhattan Tucson, AZ 85746	Age 57, Single, Brother	1/6
Rachel M. Flores 3601 Keltner Ave. Apt. A El Paso, TX 79904	Age 53, Single, Sister	1/6
Richard Flores 3617 Flory Ave. El Paso, TX 79904	Age 54, Married, Brother	1/6
Angela Michelle Fischman 1565 NE 72 nd Ave. Portland, OR 97213	Age 49, Single, Niece	1/6

11. Each marriage of the Decedent and all children, if any, born to or adopted by Decedent have been listed in this Application.

12. A necessity exists for the administration of this estate in order to pay debts and expenses of this estate, to collect estate assets, and for other reasons sufficient in law to constitute a necessity for administration.

13. It is anticipated that all of the distributees of Decedent's estate, none of whom are under any legal disability, will agree to the advisability of an independent administration, will agree that Joanne F. Kuehne, Patricia R. Carvalho, and Melanie R. Redman should be appointed independent co-administrators to serve without bond, and will request that no other action be had in this Court in relation to the settlement of Decedent's estate other than the return of an inventory, appraisalment, and list of claims or affidavit in lieu of inventory. Instruments reflecting such agreement will be filed prior to any final hearing on this Application.

14. It is in the best interest of this estate and the Decedent's heirs for the Court to enter an order declaring Decedent's heirs, creating an independent administration of Decedent's estate, and appointing Joanne F. Kuehne, Patricia R. Carvalho, and Melanie R. Redman as independent co-administrators to serve without bond.

15. Joanne F. Kuehne, Patricia R. Carvalho, and Melanie R. Redman are qualified and not disqualified by law from accepting letters of independent administration.

16. There is no need for the appointment of appraisers.

17. This application has been brought in good faith and for just cause.

WHEREFORE, Applicant prays that citation be issued as required by law to all persons interested in this estate in the manner and for the length of time required by law; that the Court determine Decedent's heirs and distributees; that the Court appoint an attorney ad litem to

represent the interests of Decedent's unknown heirs; that the Court create an independent administration of this estate and appoint Joanne F. Kuehne, Patricia R. Carvalho, and Melanie R. Redman as independent co-administrators to serve without bond; that letters of independent administration be issued to Joanne F. Kuehne, Patricia R. Carvalho, and Melanie R. Redman, that no appraisers be appointed; and that such other and further orders be entered as the Court deems proper.

Respectfully submitted,

HOPPER MIKESKA, PLLC

By: 

CRAIG HOPPER

State Bar No. 00794947

chopper@hoppermikeska.com

CLAIRE D. EAST

State Bar No. 24051689

ceast@hoppermikeska.com

400 West 15th Street, Suite 408

Austin, Texas 78701

(512) 615-6195 Telephone

(512) 615-6194 Fax

VERIFICATION

THE STATE OF TEXAS

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COUNTY OF TRAVIS

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Before me, the undersigned authority, on this day personally appeared Joanne F. Kuehne, and after being duly sworn, stated the following:

Insofar as is known to me, all of the allegations contained in the foregoing Application are true in substance and in fact and no material fact or circumstance has, within my knowledge, been omitted from the Application.


Joanne F. Kuehne

Subscribed and sworn to before me, the undersigned authority, by Joanne F. Kuehne on this 7 day of March, 2017, to certify which, witness my hand and seal of office.




Notary Public, State of Texas

VERIFICATION

THE STATE OF TEXAS §
 §
COUNTY OF TRAVIS §

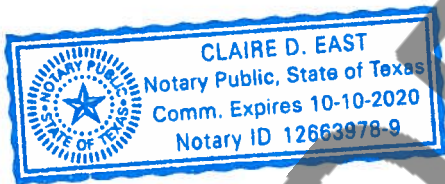
Before me, the undersigned authority, on this day personally appeared Patricia R. Carvalho, and after being duly sworn, stated the following:

Insofar as is known to me, all of the allegations contained in the foregoing Application are true in substance and in fact and no material fact or circumstance has, within my knowledge, been omitted from the Application.



Patricia R. Carvalho

Subscribed and sworn to before me, the undersigned authority, by Patricia R. Carvalho on this 7 day of March, 2017, to certify which, witness my hand and seal of office.





Notary Public, State of Texas

VERIFICATION

THE STATE OF TEXAS

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COUNTY OF TRAVIS

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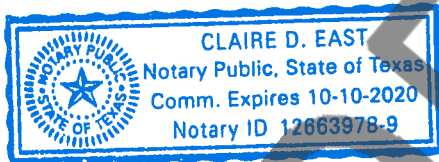
Before me, the undersigned authority, on this day personally appeared Melanie R. Redman, and after being duly sworn, stated the following:

Insofar as is known to me, all of the allegations contained in the foregoing Application are true in substance and in fact and no material fact or circumstance has, within my knowledge, been omitted from the Application.



Melanie R. Redman

Subscribed and sworn to before me, the undersigned authority, by Melanie R. Redman on this 7 day of March, 2017, to certify which, witness my hand and seal of office.




Notary Public, State of Texas